

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES,

Plaintiff,

v.

Civil Action No. 3:11cv00221

ENCORE CAPITAL GROUP, INC., *et al.*

Defendants.

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DISCOVERY**

Defendants, Encore Capital Group, Inc., Midland Funding, LLC, and Midland Credit Management, Inc. (collectively, the "Midland Defendants"), by counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rule 7(F)(2)(b), hereby move for an extension of time up to and including October 17, 2011, within which to file their responses and privilege log with respect to the discovery served by Plaintiff, Gilbert James. The reasons in support of the motion are set forth in the accompanying memorandum in support.

WHEREFORE, Defendants, Encore Capital Group, Inc. Midland Funding, LLC, and Midland Credit Management, Inc., by counsel, hereby requests that the Court enter an Order: (1) granting the Midland Defendant's Motion for Extension of Time to Respond to Discovery; (2) providing the Midland Defendants with an extension of time to respond to Plaintiff's First Set of Requests for Production and First Set of Interrogatories until on or before October 17, 2011; (3) providing the Midland Defendants with an extension of time to serve their privilege log until October 17, 2011; and (4) awarding the Midland Defendants such further relief as the Court deems appropriate.

**ENCORE CAPITAL GROUP, INC.,
MIDLAND FUNDING, LLC and
MIDLAND CREDIT MANAGEMENT, INC.**

By: /s/ Timothy J. St. George

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of September, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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